

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: BAY STATE GAS COMPANY
STAFFING AND OTHER MATTERS**

DTE 06-31

FIRST SET OF INFORMATION REQUESTS OF LOCAL 273

UWUA 1-1:

- (a) Please list the name and job title of each person at NiSource or NiSource-affiliate to whom Mr. Bryant reports. Include a summary description of the matters which Mr. Bryant would report on or discuss with each person named in this answer.
- (b) To the extent not covered in (a), please list the name and job title of each person at NiSource or NiSource-affiliate with whom Mr. Bryant regularly or periodically confers regarding staffing requirements or staffing levels, service quality, investment in infrastructure, outsourcing, labor relations, or regulatory affairs, defining “regularly or periodically confers” to include individuals with whom Mr. Bryant communicates two or more times per year.

UWUA 1-2:

Please provide a copy of any customer satisfaction surveys of the customers of Bay State or any NiSource affiliate or subsidiary completed during 2005 or 2006. Include University of Michigan survey, American Customer Satisfaction Index survey, or J.D. Powers survey that included customers of any NiSource affiliate or subsidiary.

UWUA 1-3:

Please list the dates and subject matters of any in-person meetings or telephone calls (to the extent logged or known) between (i) Steve Bryant, Dan Cote, any NiSource or NiSource-affiliate employees or agents, or any lobbyists or regulatory affairs consultants for Bay State or NiSource and (ii) any of the Department’s commissioners or staff, between the dates December 1, 2005 and the date of answering this information request.

UWUA 1-4:

Please provide a copy of any written correspondence, e-mails or notes of any kind sent to or received from the Department, for the period January 1, 2005 to date, regarding in any manner:

the operation of the companies gas storage, production or distribution facilities; safety procedures, compliance with rules, regulations, or guidance of the Department or any other state or federal agency; or compliance with the company's own operations manuals or guidelines.

UWUA 1-5:

(a) Please provide a summary table, organized by company and function within the company (e.g., telephone service/customer service, billing, etc.) of any all employees of Bay State, NiSource or any NiSource affiliate or subsidiary who have been laid off, offered early severance, relocated or reclassified (collectively, "change of status"), where the change of status is a result of or in any way connected with the signing of the agreement with IBM outsourcing agreement (or agreement with any subsidiary or related vendor) and implementation of that agreement (or agreements). Where employees have been relocated or offered relocation, please include both the employee's then-current location and the offered or actual place of relocation (e.g. "10 customer service reps then located in XXXX relocated or offered relocation to YYYY.")

(b) Please provide a similar summary table, but showing projected change of status for the period June 14, 2006 to June 30, 2008.

(c) Please provide the number of employees, whether direct Bay State/NiSource employees or employed by IBM or any of its sub-contractors or vendors, added at any location or to any function (e.g., call center, billing), as a result or in any way connected with the signing of the IBM outsourcing agreement (or agreement with any subsidiary or related vendor), including the date, location and job function of any such additions. Also include a summary of any such changes planned for the period June 14, 2006 to June 30, 2008.

UWUA 1-6:

Please state the location(s) where Bay State or NiSource processes pay roll checks for Bay State employees. Also include the location where personnel files for Bay State employees are maintained.

UWUA 1-7:

(a) Please explain how Bay State and/or NiSource establish a Bay State budget for the ensuing fiscal year, including which personnel at Bay State and NiSource are involved and the process by which the company proceeds from initial discussions to a finalized budget. To the extent there are different budgets (e.g., capital versus operating), including a separate description for each such budget.

(b) Include a copy of the budgets for the budget periods most closely corresponding to calendar 2005, 2006 and, if available, 2007, and any revisions to those budgets.

UWUA 1-8:

Please provide a copy of all communications (including but not limited to e-mails, memos, notes and logs of telephone calls) between or among Steve Bryant, Dan Cote and any other Bay State or NiSource employee, advisor or consultant, regarding the oversight hearings held by Senator Marc Pacheco of the Senate Post-Audit and Oversight Committee on or about November 4, 2005.

UWUA 1-9:

(a) Has Bay State maintain that at any time since November 1997, but excluding the filing it made on April 18, 2006 in this docket, the company has sought the permission of the Department to engage in any staffing level cutbacks below the levels that existed in November 1997? If yes, please produce a copy of any and all documents that the company considers requests for such permission.

(b) At any time since November 1997, has the company received the permission of the Department to reduce its staffing levels below the levels that existed in November 1997? If yes, please produce the documents that the company believes amount to such permission.

UWUA 1-10:

(Ex. BSG-1, p 1) With whom at NiSource does Mr. Bryant “coordinate the regulatory, governmental and business policies of Bay State?” Include names and titles.

UWUA 1-11:

Did any Bay State or NiSource employee receive any type of bonus or additional compensation due to either their participation in DTE 05-27 or the result in that docket? If “yes,” please provide the amount of the compensation; to whom provided; and the basis for the additional compensation.

UWUA 1-12:

(Ex. BSG-1, p. 8, l. 20 -28) Has the company since 1997 had the same reading of section 1E(b) as stated by Mr. Bryant in his testimony? If the company has changed its own reading of this statute over time, please provide any different interpretations of the statute that the company has had, and the relevant dates of those interpretations.

Respectfully Submitted,

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